

COHEN & GREEN

May 7, 2025

Hon. Philip M. Halpern, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007-1312

By Electronic Filing.

Re: Ordonez-Vargas v. Orange County et al., 25-cv-0064

Dear Judge Halpern:

My firm, with co-counsel, represents Plaintiff in the case above. As the Court asked in ECF No. 8, I write to provide an updated on the status of the stay in *In re: Wellpath Holdings, Inc., et al.*, 24-90533 (Bankr. S.D. Tex.) (“*In re Wellpath*”).

Our understanding is that the *In re Wellpath* stay has been extended, but this is likely the last extension. Wellpath’s reorganization plan has been approved, and there is a clear extension of the stay as to specified non-debtor entities that runs through today (May 7, 2025). We are coordinating with various counsel in *In re Wellpath* to keep up to date and better understand exactly the state of play now that the reorganization plan has been approved (including trying to get the exact effective date of the plan, and what it means — if anything — here). Plaintiff has also formally opted out of releasing claims against certain non-debtor entities, as provided for in the relevant notice from *In re Wellpath*.

Given the above, Plaintiff believes it is best to continue a stay briefly, so Plaintiff can obtain the details of the plan, and so on, as referred to above. Plaintiff believes 45 days should be enough and leave room for any issues that may come up — and if anything unexpected occurs requiring a further stay, Plaintiff can make a new motion. Accordingly, Plaintiff also ask that the Court extend the time to serve Defendants for 75 days (e.g., 30 days after the requested 45 day extension of the stay), so Plaintiff neither violates the stay nor lets the time to serve expire.

As always, I thank the Court for its continued time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:

All relevant parties by electronic filing.